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June 29, 2020

-VIA ELECTRONIC FILING -

Adam Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

REDACTED

Re: Docket No. 20200001-EI

Dear Mr. Teitzman:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") First Request for Extension of Confidential Classification of Materials Provided Pursuant to Audit No. 17-023-4-2. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the confidential documents, and all the information that FPL asserts is entitled to confidential treatment has been highlighted. Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. Exhibit C is a justification table in support of FPL's Request for Confidential Classification. Exhibit D is the declaration in support of FPL's Request for Confidential Classification.

- COM _____
- AFD** _____
- APA _____
- ECO _____
- ENG _____
- GCL _____
- IDM _____
- CLK _____

Please contact me if you or your Staff has any questions regarding this filing.

Sincerely,

s/ Maria Jose Moncada
Maria Jose Moncada

Enclosure

cc: Counsel for Parties of Record (w/ copy of FPL's Request for Confidential Classification)

RECEIVED-FPSC
2020 JUN 29 PM 4:50
COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchase power cost recovery
clause with generating performance incentive
factor

Docket No: 20200001-EI

Date: June 29, 2020

**FLORIDA POWER & LIGHT COMPANY'S FIRST REQUEST
FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION OF
MATERIALS PROVIDED PURSUANT TO AUDIT NO. 17-023-4-2**

Pursuant to Section 366.093, Florida Statutes ("Section 366.093") and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") hereby submits its First Request for Extension of Confidential Classification of Information Provided Pursuant to Audit No. 17-023-4-2 ("Confidential Information"). In support of this request, FPL states as follows:

1. On May 18, 2017, FPL filed a Request for Confidential Classification of the Confidential Information, which included Exhibits A, B, C and D ("May 18, 2017 Request"). By Order No. PSC-2017-0251-CFO-EI, dated June 29, 2017 ("Order 0251"), the Commission granted FPL's May 18, 2017 Request. FPL adopts and incorporates by reference the May 18, 2017 Request and Order 0251.

2. The period of confidential treatment granted by Order 0251 will soon expire. Some of the Confidential Information that was the subject of FPL's May 18, 2017 Request and Order 0251 warrants continued treatment as proprietary and confidential business information within the meaning of Section 366.093(3). Accordingly, FPL hereby submits its First Request for Extension of Confidential Classification.

3. Included with this request are First Revised Exhibit A, First Revised Exhibit B, together with First Revised Exhibit C to reduce the number of pages for which confidential treatment is sought. FPL has identified in First Revised Exhibits A, B and C all of the information in work papers that warrants continued confidential treatment. First Revised Exhibit C is a table that identifies the specific pages, lines or columns that remain confidential. The table

also references the specific statutory basis for confidentiality and the declarants who support the requested classification.

4. Also included as First Revised Exhibit D is the declarations of Stephanie Castaneda and Gerard J. Yupp in support of this request.

5. The Confidential Information is intended to be and has been treated by FPL as private, its confidentiality has been maintained, and its disclosure would cause harm to FPL and its customers. Pursuant to Section 366.093, such materials are entitled to confidential treatment and are exempt from the disclosure provisions of the public records law. Thus, once the Commission determines that the information in question is proprietary confidential business information, the Commission is not required to engage in any further analysis or review such as weighing the harm of disclosure against the public interest in access to the information.

6. As explained more fully in the declaration included as First Revised Exhibit D, certain documents contain information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. This information is protected by Section 366.093(3)(d), Fla. Stat.

7. Also, certain documents contain information relating to competitive interests, the disclosure of which would impair the competitive business of FPL and its vendors. This information is protected by Section 366.093(3)(e), Fla. Stat.

8. Nothing has changed since the Commission entered Order 0251 to render the Confidential Information identified in First Revised Exhibit C stale or public, such that continued confidential treatment would not be appropriate.

9. Pursuant to Section 366.093(4), F.S., the information for which confidential classification is granted remains protected from disclosure up to 18 months unless good cause is

shown to grant protection from disclosure for a longer period. Currently, the Commission retains audit reports for period of seven years at which time the audit materials are returned to FPL unless Commission staff or another affected person requests that these audit materials continue to be retained. The nature of these materials will not change in the next three years. Therefore, to promote administrative efficiency, FPL requests confidential classification for a period of thirty-six (36) months. Upon a finding by the Commission that the Confidential Information remains proprietary and confidential business information, the information should not be declassified for at least an additional thirty-six (36) month period and should be returned to FPL as soon as it is no longer necessary for the Commission to conduct its business. See § 366.093(4), Fla. Stat.

WHEREFORE, for the above and foregoing reasons, as more fully set forth in the supporting materials included with or incorporated in this Request, Florida Power & Light Company respectfully requests that its First Request for Extension of Confidential Classification be granted.

Respectfully submitted,

Maria Jose Moncada
Senior Attorney
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Juno Beach, FL 33408
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Facsimile: (561) 691-7135
Email: maria.moncada@fpl.com

By: s/ Maria Jose Moncada
Maria Jose Moncada
Florida Bar No. 0773301

CERTIFICATE OF SERVICE
Docket No. 20200001-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished
by electronic service on this 29th day of June 2020 to the following:

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White Springs**

By: s/ Maria Jose Moncada
Maria Jose Moncada
Florida Bar No. 0773301

EXHIBIT A

CONFIDENTIAL

EXHIBIT B

REDACTED

Partus File ID	Customer Name	Employee ID	FPL ID	Account Description	Transaction Description	Payee	Invoice Date	Invoice No	Due Date	Amount Due
1 2509537		32059	6030000052	Interest on Disbursements	Interest on Disbursements		7/5/2016	1006416083	8/4/2016	\$89.14
2 2509537		32059	6030000052	Interest on Disbursements	Interest on Disbursements		7/5/2016	1006416083	8/4/2016	\$35.23
3 2509537		32059	6030000052	Household Goods Shipment	400N-Item 135 Destination	UNITED VAN LINES##141216	7/5/2016	1006416083	8/4/2016	\$241.25
4 2509537		32059	6030000052	Household Goods Insurance	Unirisc Insurance, Insured Value -\$242,400	UNITED VAN LINES##141216	7/5/2016	1006416083	8/4/2016	\$920.80
5 2509537		32059	6030000052	Household Goods Shipment	400N-Full Unpack	UNITED VAN LINES##141216	7/5/2016	1006416083	8/4/2016	\$1,130.68
6 2509537		32059	6030000052	Household Goods Shipment	400N-Item 135 Origin	UNITED VAN LINES##141216	7/5/2016	1006416083	8/4/2016	\$460.70
7 2509537		32059	6030000052	Household Goods Shipment	400N-P&C Insurance	UNITED VAN LINES##141216	7/5/2016	1006416083	8/4/2016	\$300.80
8 2509537		32059	6030000052	Household Goods Shipment	Fuel Surcharge	UNITED VAN LINES##141216	7/5/2016	1006416083	8/4/2016	\$75.20
					Household Goods Shipment, Actual Wt - 20,200 lbs, Billed Wt - 19,800 lbs, Pack Dt - 03/31/2016, Load Dt - 03/31/2016, Delivery Dt - 04/04/2016, Origin Loc - Soddy Daisy, TN, USA, Dest Loc - Juno Beach, FL, USA					
9 2509537		32059	6030000052	Household Goods Shipment	Shuttle Service	UNITED VAN LINES##141216	7/5/2016	1006416083	8/4/2016	\$954.45
10 2509537		32059	6030000052	Household Goods Shipment	Third Party Services	UNITED VAN LINES##141216	7/5/2016	1006416083	8/4/2016	\$666.00
11 2509537		32059	6030000052	Household Goods Shipment	400N-Full Pack	UNITED VAN LINES##141216	7/5/2016	1006416083	8/4/2016	\$4,777.06
12 2509537		32059	6030000052	Household Goods Shipment	Appliance Service - Third Party	UNITED VAN LINES##141216	7/5/2016	1006416083	8/4/2016	\$215.50
09537 Total and Total										\$17,386.81
										\$17,386.81

44-1 p3

Florida Power & Light
Capacity Cost Recovery Clause
DKT# 170001-EI, ACN 17-023-4-2
TYE 12/31/2016

Title _____

CONFIDENTIAL

PBC

SOURCE Request 16

Handwritten initials/signature

Handwritten mark

JHP
 #17

Title _____

Qualifying Facility Monthly Billing Statement

A B C

Facility Name: BROWARD RESOURCE RECOVERY SOUTH

Region: Southeast

Billing Month: September, 2016

Number of Hours in Month: 720

Number of Peak Hours in Month: 270

Committed Capacity: 3,500 MW

Energy Received, All Hours: 33,400.377 MWH (D23) 3,777,113 MWH (AA) (P1, P33) 2,520,000 MWH ('91) (P1, P33)

1 **Energy Received, All Peak Hours:** [REDACTED]

2 **Sales (Wheeled):** [REDACTED]

3 **Net Energy Received, All Hours:** [REDACTED] (P1, P3)

4 **Maximum Hourly Energy:** [REDACTED]

5 **Committed Capacity:** 462/3-1 [REDACTED]

6 **Monthly Billing Capacity Factor:** [REDACTED]

7 **Monthly Peak Capacity Factor:** [REDACTED]

8 **Annual Capacity Factor:** 462/3-1 [REDACTED]

9 **Annual Peak Capacity Factor:** [REDACTED]

10 **Billing Capacity Factor:** [REDACTED]

11 **Unit Energy Cost:** [REDACTED] (P30)

Monthly Energy Payment: (As Available) (\$70,782.68) + (\$48,378.29) = \$119,160.97 (P30) ('91) Total (P3, P33)

Monthly Capacity Payment: (P1, P33) (\$99,812.04) = \$99,812.04 (P1, P33) (462)

$$\frac{462}{3-1} \rightarrow \frac{462}{2} = 231$$

CONFIDENTIAL

PBC

Execution Date/Time: 10/24/16 at 11:08:20
 Invoice ID: 2231

SOURCE Reg. 18

P2
 462

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Capacity Audit Workpaper Number 46-2/3-1

[Pages 1 through 6]

Purchased Power

Title _____

FLORIDA POWER & LIGHT COMPANY

Billing Statement

For Purchased Power From

WHEELABRATOR SOUTH BROWARD

For Transaction Period:

SEPTEMBER 1, 2016 through SEPTEMBER 30, 2016

GENERATION

PA, P33 3,777.113 MWH ('09 AA)
 Variable O & M ^{^1}

	A	AMOUNT	B
1		\$	
2	[REDACTED]		[REDACTED]
3			

PA, P33 2,520.000 MWH ('91 CONTRACT)

4			[REDACTED]
---	--	--	------------

6,297.113 Total MWH

Monthly Energy Payment

119,565.12 *PA*

PA, P3
 Amount Due for Capacity Payment

('91 CONTRACT)

99,812.04 *PA* *46-2*
3

Monthly Capacity Payment

99,812.04 *PA, PA*

FPL Customer Charge ^{^1}

(1,620.94) *PA, P33*

TOTAL

\$ 217,756.22 *PA*

^{^1} GSLDT-3 Rate Schedule effective 1/01/2016

SOURCE Reg 18

INVOICE NO: 2231

P16
P1
46-2

EXHIBIT C

JUSTIFICATION TABLE

FIRST REVISED EXHIBIT C

COMPANY: Florida Power & Light Company
 TITLE: List of Confidential Workpapers
 AUDIT: FPL, Capacity Audit
 AUDIT CONTROL NO: 17-023-4-2
 DOCKET NO: 20200001-EI
 DATE: June 29, 2020

Bold denotes revision to reduce the amount of confidential classification previously requested or a new declarant

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
16-2/2	Capital Sample	1	N			
16-2/2-1	Capital Sample	1	N			
42-1	Transmission Revenues	1	N			
42-1/1	Transmission Revenues	1	N			
42-1/1-1	Transmission Revenues	1	N			
42-1/1-1/1	Transmission Revenues	4	N			
42-1/1-2	Transmission Revenues	1	N			
42-1/1-2/1	Transmission Revenues	4	N			
42-1/2	Transmission Revenues	1	N			
42-2	Transmission Revenues	2	N			
42-2/1	Transmission Revenues	1	N			
42-2/2	Transmission Revenues	1	N			
42-2/3	Transmission Revenues	1	N			
42-2/4	Transmission Revenues	1	N			
42-2/5	Transmission Revenues	1	N			
42-2/6	Transmission Revenues	2	N			
44-1	Security Fees	4	N			
44-1/3	Security Fees	1	N			
44-1/3-1	Security Fees	1	Y	Col. A, Lns. 1-14	(e)	S. Castaneda
44-1/4	Security Fees	1	N			
44-1/5	Security Fees	1	N			
46-2	Purchased Power	1	N			
46-2/1	Purchased Power	1	N			
46-2/1-1	Purchased Power	1	N			
46-2/2	Purchased Power	1	N			
46-2/2-1	Purchased Power	4	N			
46-2/2-2	Purchased Power	1	N			
46-2/3	Purchased Power	1	Y	Col. A, Lns. 1-11 Cols. B-C, Line 1	(d), (e)	G. Yupp
46-2/3-1	Purchased Power	6	Y	ALL	(d)	G. Yupp
46-2/3-2	Purchased Power	1	Y	Col. A, Line 2 Col. B, Lns. 1-4	(e)	G. Yupp
46-3	Purchased Power	1	N			
46-3/1	Purchased Power	1	N			
46-3/1-1	Purchased Power	1	N			
46-3/1-1/1	Purchased Power	1	N			
46-3/2	Purchased Power	1	N			
46-3/2-1	Purchased Power	2	N			

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
46-3/2-2	Purchased Power	1	N			
46-4	Purchased Power	1	N			
46-4/1	Purchased Power	1	N			
46-4/2	Purchased Power	1	N			
46-4/2-1	Purchased Power	4	N			
46-4/3	Purchased Power	1	N			

EXHIBIT D

DECLARATIONS

FIRST REVISED EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchase Power Cost Recovery
Clause with Generating Performance Incentive
Factor

Docket No. 20200001-EI

DECLARATION OF GERARD J. YUPP

1. My name is Gerard J. Yupp. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director of Wholesale Operations in the Energy Marketing and Trading Division. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed Exhibit C, and the documents that are included in Exhibit A to FPL's First Request for Confidential Classification of Information Obtained in Connection with Audit No. 17-023-4-2, for which I am listed as the declarant. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute contractual data such as pricing formulas and other terms, payment records, and supplier rates for capacity and energy transactions, the disclosure of which would impair the efforts of FPL to contract for capacity and energy on favorable terms for the benefit of its customers, and would impair the competitive interests of FPL and its vendors. Certain information in these documents and materials would also place FPL at a disadvantage when coupled with other information that is publicly available. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Nothing has occurred since the issuance of Order No. PSC-2017-0251-CFO-EI to render the information stale or public, such that continued confidential treatment would not be appropriate. Therefore, the information should remain confidential for a period of not less than 36 months. In addition, they should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business, so that FPL can continue to maintain the confidentiality of these documents.

4. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.


Gerard J. Yupp

Date: 6/24/2020

FIRST REVISED EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchase Power Cost Recovery
Clause with Generating Performance Incentive
Factor

Docket No. 20200001-EI

DECLARATION OF STEPHANIE CASTANEDA

1. My name is Stephanie Castaneda. I am currently employed by Florida Power & Light Company ("FPL") as Sr Director Finance, Nuclear Business Operations. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed Exhibit C, and the documents that are included in Exhibit A to FPL's First Request for Extension of Confidential Classification of Information Obtained in Connection with Audit No. 17-023-4-2, for which I am listed as the declarant. Such documents and materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information and contain information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. Specifically, the documents contain information concerning employee benefits and compensation. To the best of my knowledge, FPL has maintained the confidentiality of this information.

3. Nothing has occurred since the issuance of Order No. PSC-2017-0251-CFO-EI to render the information stale or public, such that continued confidential treatment would not be appropriate. Therefore, the information should remain confidential for a period of not less than 36 months. In addition, they should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business, so that FPL can continue to maintain the confidentiality of these documents.

4. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.

Stephanie Castaneda

Stephanie Castaneda

Date: June 22, 2020